

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

ENEIDA DE LOS ANGELES MENDEZ PIÑERO

DEBTOR

CASE NO. 15-01781/BKT

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM 2014 TAX REFUND**

TO THE HONORABLE COURT:

NOW COMES, ENEIDA DE LOS ANGELES MENDEZ PIÑERO, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor's confirmed Plan dated May 18, 2015, provides that debtor's tax refunds will be paid into the Plan. See docket #23.
2. The debtor has received the 2014 tax refund in the sum of \$985.16. Attached is copy of the check stub, dated October 15, 2015, issued by the Puerto Rico Treasury Department.
3. The debtor respectfully submits to the Court that she needs to use these funds to pay for: household repair expenses. Attached is copy of household repair expenses estimate/invoice.
4. The debtor needs to use the funds from the 2014 "tax refund" to pay for this reasonable expenses. Furthermore, the debtor is living within a very "tight" budget which barely covers her living expenses and a Plan payment of \$750.00.
5. Based on the above-stated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for these expenses with the "tax refund".

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this

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Debtor's Motion Requesting Order
Case no. 15-01781/BKT13

Honorable Court grant the foregoing motion and allow the use of the funds from the 2014 tax refund by the debtor to pay for the above-stated expenses.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent via US Mail to debtor, Eneida de los Ángeles Méndez Piñero, to the address of record: Estancias del Río, 66 Tanamá Street, Aguas Buenas, PR 00703.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of October, 2015.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

FECHA	NUMERO DE C.V.P.	DESCRIPCION CONTRATO	FACTURA/OPF	IMPORTE DEL CONTRIBUYENTE
15/10/15	000019	REINT 2014	---	\$*****985.16

	DIA	MES	AÑO
18453744	15	10	15
NUMERO DE CHEQUE	FECHA EMISION		

ESTADO LIBRE ASOCIADO DE PUERTO RICO

RETENGA ESTE TALON
PARA SUS RECORDS.

Modelo SC 781.3
31-ENERO-2006

Verdadero para todos los mecanismos de seguridad. Si no es así, no complete seguridad/código.

REINT 2014

DIA	MES	AÑO
15	10	15

FECHA EMISION

DIA	MES	AÑO
15	04	16

VENCE EN

18453744

NUMERO DE CHEQUE

IMPORTE
\$*****985.16

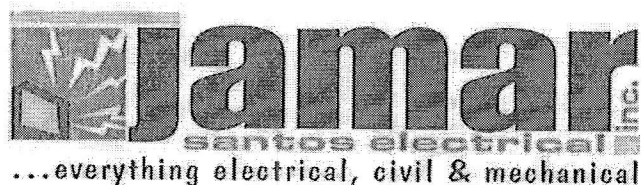
NOVECIENTOS OCHENTA Y CINCO DOLARES CON 16/100

ENEIDA MENDEZ PINERO

BGF

La Zarcoz
SECRETARIO DE HACIENDA

18453744 000019 15 10 15



2 de octubre de 2015

ATT: Sra. Eneida Méndez Pinero
Urb. Estancias del Río Tanama 66
Aguas Buenas P.R. 00763

Cotización No. JSE-10-02-359

RE: Mejoras a facilidades eléctricas; cambio e instalación de Panel
Eléctrico. Cotización # JSE-10-02-359.

Sra. Méndez;

Esta Propuesta se realizó basada en la inspección realizada en la residencia para el cambio e instalación de panel eléctrico y re-alambrado de la casa. Esto se debe por la falla causada por el panel existente ya que no cubre capacidad necesitada en la residencia por fallo de corto circuito.

Propuesta:

1)	Material	\$ 495.00
2)	Labor	\$ 605.00
Total		\$ 1,100.00

Office: (787) 703-0334
Fax: (787) 744-7197

P.O. Box 1379 Gurabo P.R. 00778

info@jamarelectrical.com
www.jamarelectrical.com

NOTA: Incluyo

- 1) Cambio e Instalación de Panel.
- 2) Corrida de Cable y Tubería para Alimentación del panel.

NOTA: No incluyo

- 1) Pagos o Contribución al municipio de Aguas Buenas o Gobierno de Puerto Rico.
- 2) Relocalización de equipos en concreto como; Lámparas, Receptáculos, Data, Teléfono.

Notas Especiales para esta propuesta;

- 1) Este trabajo es considerado en horas regulares no tiempo extra.
- 2) Jamar realizara este trabajo en una semana.
- 3) Propuesta valida por 10 días.

Cordialmente

Omar M. Santos

Omar M. Santos
Project Manager

Cliente

Office: (787) 703-0334
Fax: (787) 744-7197

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